

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA¹

ORIN KRISTICH,

Plaintiff,

vs.

Case No. CIV-23-544-R

FNU Casady, et al.,

Defendants.

DEFENDANTS' RESPONSES TO PLAINTIFF'S FIRST
SUBMISSION OF INTERROGATORIES

COME NOW Defendants by and through their attorney of record, Darrell L. Moore, OBA #6332, of J. Ralph Moore, P.C., Attorneys at Law, responding to Plaintiff's First Submission of Interrogatories, as follows:

Interrogatory No. 1: Under what Trust are the Corporation CCA chartered as the State of Oklahoma, in the County of Cushing Operating under?

Response to Interrogatory No. 1: Objection, Defendants do not understand Plaintiff's Interrogatory. Without waiving this objection, CoreCivic, Inc., a corporation, owns and operates the Cimarron Correctional Facility. CoreCivic, Inc., is headquartered in Nashville, Tennessee. CoreCivic, Inc., is authorized by the State of Oklahoma to operate in Oklahoma.

Interrogatory No. 2: What is the name of the Trust?

Response to Interrogatory No. 2: Objection, Defendants do not understand Plaintiff's Interrogatory. Without waiving this objection, CoreCivic, Inc., a corporation, owns and operates the Cimarron Correctional Facility. CoreCivic, Inc., is headquartered in Nashville, Tennessee. CoreCivic, Inc., is authorized by the State of Oklahoma to operate in Oklahoma.

Interrogatory No. 3: Who are the Trustees?

Response to Interrogatory No. 3: Objection, Defendants do not understand Plaintiff's Interrogatory. Without waiving this objection, CoreCivic, Inc., a corporation, owns and operates the Cimarron Correctional Facility. CoreCivic, Inc., is headquartered in Nashville, Tennessee. CoreCivic, Inc., is authorized by the State of Oklahoma to operate in Oklahoma.

Interrogatory No. 4: Does this Trust issue permits and/or Licenses to medical staff?

Response to Interrogatory No. 4: Objection, Defendants do not understand Plaintiff's Interrogatory. Without waiving this objection, CoreCivic, Inc., a corporation, owns and operates the Cimarron Correctional Facility. CoreCivic, Inc., is headquartered in Nashville, Tennessee. CoreCivic, Inc., is authorized by the State of Oklahoma to operate in Oklahoma. CoreCivic, Inc., employs licensed medical professionals.

Interrogatory No. 5: Does this Trust place the Registered Owner, Doctor/Nurse, or Licensed Agent in a Fiduciary position?

Response to Interrogatory No. 5: Objection, Defendants do not understand Plaintiff's Interrogatory.

Interrogatory No. 6: If so, is the Licensee or Permittee an employee under contract?

Response to Interrogatory No. 6: Objection, Defendants do not understand Plaintiff's Interrogatory.

Interrogatory No. 7: Is Nurse Casady an employee under contract?

Response to Interrogatory No. 7: Nurse Casady is employed by CoreCivic, Inc.

Interrogatory No. 8: What are the names of the Corporation(s) that hold the contract for your employee license or permit?

Response to Interrogatory No. 8: Objection, Defendants do not understand Plaintiff's Interrogatory. Without waiving this objection, CoreCivic, Inc., a corporation, owns and operates the Cimarron Correctional Facility. CoreCivic, Inc., is headquartered in Nashville, Tennessee. CoreCivic, Inc., is authorized by the State of Oklahoma to operate in Oklahoma. CoreCivic, Inc., employs licensed medical professionals.

Interrogatory No. 9: Who ordered Nurse Casady to leave Mr. Kristich locked in the cell?

Response to Interrogatory No. 9: Objection to the form of Plaintiff's interrogatory. Defendants have denied Plaintiff's allegations.

Interrogatory No. 10: What was the order word for word?

Response to Interrogatory No. 10: Objection to the form of Plaintiff's interrogatory. Defendants have denied Plaintiff's allegations.

Interrogatory No. 11: Who ordered Nurse Foster to not respond to Mr. Kristich's injury?

Response to Interrogatory No. 11: Objection to the form of Plaintiff's interrogatory. Defendants have denied Plaintiff's allegations.

Interrogatory No. 12: What was the order word for word?

Response to Interrogatory No. 12: Objection to the form of Plaintiff's interrogatory. Defendants have denied Plaintiff's allegations.

Interrogatory No. 13: Is either Nurse Casady or Foster a licensed Agent for any Chief prosecutor in this case or any case regarding Mr. Kristich?

Response to Interrogatory No. 13: Objection, Defendants do not understand Plaintiff's Interrogatory. Without waiving this objection, CoreCivic, Inc., a corporation, owns and operates the Cimarron Correctional Facility. CoreCivic, Inc., is headquartered in Nashville, Tennessee. CoreCivic, Inc., is authorized by the State of Oklahoma to operate in Oklahoma. CoreCivic, Inc., employs licensed medical professionals.

Interrogatory No. 14: Is either Nurse Casady or Foster licensed for Administrative enforcement of the Statutes of the United States or the State of Oklahoma?

Response to Interrogatory No. 14: Objection, Defendants do not understand Plaintiff's Interrogatory.

Interrogatory No. 15: Is CCA or the unknown medical contractor of the Municipal Corporation known as CCA a fiduciary and/or Trustee under a Public or other Trust?

Response to Interrogatory No. 15: Objection, Defendants do not understand Plaintiff's Interrogatory.

Interrogatory No. 16: Is CCA, Nurse Casady, or Foster under contract within a Trust chartered as a service corporation on behalf of a fictitious entity called the United States?

Response to Interrogatory No. 16: Objection, Defendants do not understand Plaintiff's Interrogatory.

Interrogatory No. 17: Is CCA, Nurse Casady, or Foster under contract within a Trust chartered as a service corporation on behalf of a fictitious entity called the FBOP?

Response to Interrogatory No. 17: Objection, Defendants do not understand Plaintiff's Interrogatory.

Interrogatory No. 18: Is CCA, Nurse Casady, or Foster under contract within a Trust chartered as a service corporation on behalf of a fictitious entity called the USMS?

Response to Interrogatory No. 18: Objection, Defendants do not understand Plaintiff's Interrogatory.

Interrogatory No. 19: Were there any service corporation Agents with Higher Rank on duty the 25th of December 2021 when Mr. Kristich was injured?

Response to Interrogatory No. 19: Objection, Defendants do not understand Plaintiff's Interrogatory. Objection to the form of Plaintiff's Interrogatory. Defendants have denied Plaintiff's allegations. Without waiving these objections, Defendants have produced to Plaintiff the Shift Rosters for December 24, 2021 – December 26, 2021.

Interrogatory No. 20: Is Casady or Forter licensed under contract?

Response to Interrogatory No. 20: Objection, Defendants do not understand Plaintiff's Interrogatory. Without waiving this objection, CoreCivic, Inc., a corporation, owns and operates the Cimarron Correctional Facility. CoreCivic, Inc., is headquartered in Nashville, Tennessee. CoreCivic, Inc., is authorized by the State of Oklahoma to operate in Oklahoma. CoreCivic, Inc., employs licensed medical professionals.

Interrogatory No. 21: Is there a contractual relationship between the municipal corporations CCA, FBOP, and/or USMS and the United States?

Response to Interrogatory No. 21: Objection to the form of Plaintiff's Interrogatory. Without waiving this objection, Defendants state there is a contractual relationship between the USMS, the City of Cushing, and CoreCivic, Inc.

Interrogatory No. 22: At what time did Casady tell Foster about Mr. Kristich's injury?

Response to Interrogatory No. 22: Objection to the form of Plaintiff's Interrogatory. Without waiving this objection, the produced medical records indicate the Plaintiff was seen in the Cimarron facility medical clinic on the morning of December 26, 2021. Orders for an x-ray in the emergency room at Cushing Hospital were charted. The medical progress note is dated December 26, 2021 at 9:51 a.m.

Interrogatory No. 23: Who else told Foster that Mr. Kristich needs medical treatment of care?

Response to Interrogatory No. 23: Objection to the form of Plaintiff's interrogatory. Defendants have denied Plaintiff's allegations. Without waiving this objection, the produced medical records indicate the Plaintiff was seen in the Cimarron facility medical clinic on the morning of December 26, 2021. Orders for an x-ray in the emergency room at Cushing Hospital were charted. The medical progress note is dated December 26, 2021 at 9:51 a.m.

Interrogatory No. 24: What time and day was Dr. Crane told of Mr. Kristich's injuries?

Response to Interrogatory No. 24: The produced medical records indicate the Plaintiff was seen in the Cimarron facility medical clinic on the morning of December 26, 2021. Orders for an x-ray in the emergency room at Cushing Hospital were charted. The medical progress note is dated December 26, 2021 at 9:51 a.m. The medical progress note states "Dr. Crane has been notified of findings and orders received for x-ray in emergency room in Cushing."

Interrogatory No. 25: Did Dr. Crane order either Casady or Foster to leave Mr. Kristich locked in a cell without medical care or treatment?

Response to Interrogatory No. 25: Objection to the form of Plaintiff's interrogatory. Defendants have denied Plaintiff's allegations. Without waiving this objection, the produced medical records indicate the Plaintiff was seen in the Cimarron facility medical clinic on the morning of December 26, 2021. Orders for an x-ray in the emergency room at Cushing Hospital were charted. The medical progress note is dated December 26, 2021 at 9:51 a.m. The medical progress note states "Dr. Crane has been notified of findings and orders received for x-ray in emergency room in Cushing." The Cushing Hospital Emergency Room record indicates Plaintiff arrived at the Cushing Hospital Emergency Room at 11:00 a.m., December 26, 2021.

Respectfully submitted,
Defendants



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Certificate of Mailing

I hereby certify that on April 25, 2025, I submitted the attached document to the Plaintiff by regular US Mail, postage prepaid:

ORIN KRISTICH # 99811-051
FCI Marianna
P.O. Box 7007
MARIANNA, FL 32447



DARRELL L. MOORE